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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY RESPONSE BRANCH
9311 GROH ROAD, ROOM 206
GROSSE ILE, MICHIGAN 48138

REPLY TO ATTENTION OF:
SE-GI

March 5, 2012

Michele Ulick Rosenthal
Garvey Schubert Barker
1191 Second Avenue
Seattle, Washington 98101-2939

Re: Completion of work under the Administrative Settlement Agreement and Order on Consent for Removal Action, Docket No. V-W-10-C-955 for the Reclamation Oil Site, Detroit, Wayne County, Michigan (Site ID # B5C5)

Dear Michele Ulick Rosenthal:

On October 25, 2011, the United States Environmental Protection Agency (EPA) issued a Administrative Settlement Agreement and Order on Consent for Removal Action (AOC) to the Potentially Responsible Party (PRP) Group, which included Univar USA, Inc., SPX Corporation, Borg Warner, Inc., and Ford Motor Company. The AOC was issued to address conditions at the Reclamation Oil Site (Site) which presented an imminent and substantial endangerment to public health and the environment. Specific factors considered in this determination were the presence of contamination that exceeded the MDEQ Generic Part 201 cleanup criteria for benzene, toluene, ethylbenzene, xylenes, trimethylbenzenes, trichloroethene, polychlorinated biphenyls (PCBs), lead, and arsenic. These soils posed potential threats based on factors set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 40 Code of Federal Regulations (CFR) 300.415 (b) (2): These factors include:

- 1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;
- 2) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate;
- 3) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
- 4) Threat of fire or explosion;
- 5) The availability of other appropriate federal or state response mechanisms to respond to the release.

Pursuant to the AOC, the Respondents submitted Work and Safety Plans for the Site on October 28, 2010. U.S. EPA approved the Work and Safety Plan, as revised, on November 29, 2010.

As required by the AOC, the Final Reports on-site activities were submitted on December 12, 2011 for the Site.

Based on oversight of the Respondents' activities at the Site, my review of the Final Reports, and a final inspection of the Site, I conclude the Respondents have completed the following work required by the AOC:

- a. The Respondents notified U.S. EPA in writing within 3 business days of their intent to comply with the AOC.
- b. The Respondents designated Horizon Environmental for remediation of the Site.
- c. The Respondents' contractors completed all Work to be performed as detailed in the AOC, dated October 12, 2011.
- d. The Respondents' contractors submitted and implemented a Site Health and Safety Plan.
- e. The Respondents' contractors submitted and implemented a Quality Assurance and Sampling Plan.
- f. The Respondents' contractors submitted final reports summarizing actions taken to comply with the AOC.
- g. The Respondents' contractors obtained, using their best efforts, access to properties necessary for completing the removal action.
- h. The Respondents' contractors transported and disposed of all wastes in accordance with U.S. EPA's Off-Site Rule.

This letter merely reflects U.S. EPA's determination that the Respondents completed the work required by the AOC. This notice of completion in no way releases the Respondents from any-potential future obligations to perform additional work to address the same, or other, conditions at the Site. Similarly, this notice of completion does not release the Respondents from any record keeping, payment, or other obligations under the AOC that extend beyond the date of this notice.

Please contact me at (734) 692-7687 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tricia A. Edwards".

Tricia A. Edwards
U.S. EPA On-Scene Coordinator

cc: Jason El-Zein, U.S. EPA RS-1
Karen Peaceman, U.S. EPA ORC
Kaushalya Khanna U.S. EPA Enforcement